## IN THE UNITED STATES INISTIBICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA

UNITED STATES OF AMERICA

2007 NAR -6 P 3: 57

Plaintiff,

VS.

**DOCKET NO. 2:06cr71** 

**BERNETTA WILLIS** 

Defendant.

## **MOTION TO CONTINUE**

COMES NOW the defendant, by and through her attorney, and moves this Honorable Court to continue the above-styled cause now set for the March 12, 2007 trial term. As grounds counsel would show unto the Court the following:

- 1. That she was recently retained by the defendant in this matter.
- 2. That counsel recently received the discovery from the defendant's previous attorney.
- 3. That the box of discovery contains volumes of information that must be carefully reviewed by counsel.
- 4. That counsel and the Assistant U.S. Attorney, Christopher Snyder, will attempt to resolve this matter before the next trial term.
- 5. That the co-defendant in this matter is represented by Attorney Richard Keith.
- 6. That Attorneys Snyder and Keith do not have an objection to a continuance of this matter.

WHEREFORE, the premises considered, counsel for the defendant respectfully request a continuance in the above-styled cause and reschedule the same at the Court's earliest convenience.

Respectfully submitted this \_

day of

2007.

VALERIE MURRY SMEDLEY

Attorney for Defendant Bernetta Willis

## ADDRESS OF COUNSEL:

459 South McDonough Street Montgomery, AL 36104 (334) 230-9596

## **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing Motion to Continue upon the Honorable Christopher Snyder, Assistant U.S. Attorney, Middle District of Alabama, One Court Square, Suite 201, Montgomery, AL 36104, by placing a copy of same in the U.S. Mail, postage prepaid and properly addressed, on this the

VALERIE MURRY SMEDLEY

Attorney for Defendant Bernetta Willis